

MEMO ENDORSED

LAW OFFICES OF PATRICK A. MULLIN

45 ROCKEFELLER PLAZA, SUITE 2000 • NEW YORK, NEW YORK 10111

WWW.TAXDEFENSE.COM

T 212-639-1600

MULLIN@TAXDEFENSE.COM

March 16, 2020

The Honorable Valerie E. Caproni
U.S. District Court for the Southern District of New York
United States Courthouse
40 Foley Square
New York, New York, 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/16/2020

Re: United States v. Salifou Conde
Case No. 19-cr-808 (VEC)

Dear Judge Caproni:

I write this letter to Your Honor with regard to the order modifying terms of pretrial release entered on March 3, 2020, which permits my client, Defendant Salifou Conde, to travel to Guinea, West Africa on March 7, 2020 through March 17, 2020 for the purpose of visiting his terminally ill father. Pursuant to the instructions in the order, Mr. Conde, among other things, has submitted a detailed itinerary, which includes flight numbers and lodging information to pretrial services prior to his departure from the United States.

Due to the current coronavirus situation, we are advised that the courier of Mr. Conde's flights, Air France, has cancelled the previously scheduled flight from Paris, France to New York City originally scheduled to arrive on March 17, 2020. Mr. Conde has subsequently arranged his return trip to the United States with a one-stop (1) transfer in Lome, Togo, West Africa. Mr. Conde advised that this flight is currently scheduled to arrive at the Newark Liberty International Airport in Newark, New Jersey on March 18, 2020 via Ethiopian Airlines flight No. ET 508.

Accordingly, the Defendant hereby request the Court to modify the above-referenced order to permit this unanticipated change to Mr. Conde's itinerary. Thank you for your every consideration.

Respectfully Submitted,

s/

PATRICK A. MULLIN

Application GRANTED. Mr. Conde is directed to contact pretrial services upon his arrival on March 18, 2020.

SO ORDERED.

PAM/rs
Via ECF.

Valerie Caproni
3/16/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE
2200 PENNSYLVANIA AVENUE N.W.
SUITE 400 EAST TOWER
WASHINGTON, D.C. 20037
T 202-688-1500

400 KELBY STREET
SUITE 1700
FORT LEE, NEW JERSEY 07024
T 201-242-9600